

Cash Transfer Programming

Feasibility and Appropriateness in the context of IOCC's humanitarian response to the refugee and migrants' crisis in Greece [Kos and Chios Island]

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Content

1. Executive summary	1
2. Introduction	4
2.1. Economic and political impact of the humanitarian crisis.....	5
3. Governmental environment	7
3.1. Administrative set-up	7
3.2. Registration Procedures.....	8
4. CTP Appropriateness: Options for improving the current response design	10
4.1. Integrating humanitarian assistance and relief activities to vulnerable host communities	10
4.1.1. The use of CTP in IOCC / Apostoli response to the financial crisis	10
4.1.2. Emergency CTP and its compatibility with ongoing assistance programs by IOCC / Apostoli.....	10
4.2. Cost Analysis with regards to IOCC / Apostoli Food Assistance.....	12
4.2.1. Comparing cost-efficiency of in-kind food assistance with CTP scenarios.....	12
4.2.2. Cost-effectiveness considerations.....	13
4.3. Considering different CTP components	14
4.3.1. Multi-Purpose cash-Grants.....	14
4.3.2. One-off unrestricted Cash-Grants with a sector purpose	15
4.3.3. Cash-for-Work.....	15
4.3.4. Voucher-Schemes.....	16
5. CTP Feasibility and operational aspects	17
5.1. General working conditions: Security and absorption capacity of local markets	17
5.2. Social acceptance and stakeholders' receptiveness towards CTP.....	17
5.3. CTP related payment methods: Legal framework and financial regulations.....	19
5.3.1. Payments to businesses participating in a voucher scheme (bank to bank).....	19
5.3.2. Physical Cash	19
5.3.3. Direct transfers to beneficiaries' bank accounts.....	19
5.3.4. Private sector financial service providers	20
5.3.5. Pre-paid Cards (MasterCard).....	20
5.3.6. Cash-for-Work Schemes.....	21
5.4. General notes about targeting and coordination	22
6. Conclusions	23
7. Annexes and project rationales	24
7.1. Activity outline: Hotel Vouchers granting safe and secure accommodation to arrivals.....	24
7.2. Activity outline: Restaurant Vouchers providing arrivals with regular hot meals	26

Glossary and acronyms

Cash Transfer Programming

Cash Transfer Programming, or CTP, refers to all kind of monetary transfer, whether as vouchers or cash assistance, to individuals, families or communities in the context of a humanitarian intervention. Revolving micro-credits, more often used in development programmes, or the financial support of governmental institutions and social safety schemes are not part of what is understood as CTP in the below paper.

Vouchers

Vouchers can be designed in different ways, depending on the context and the intended use. In terms of the technical options, vouchers can be e.g. made of paper, they can come in the form of a prepaid-cards equipped with a specific barcode, as a smart-card, containing information on an electronic chip, or mobile phone vouchers. Vouchers are restricted on a usage –level; they can only be redeemed against services or goods pre-defined by the humanitarian agency (e.g. food-vouchers to be redeemed in participating restaurants).

Multi-Purpose cash-Grants

Multi-Purpose cash-Grants are defined as a transfer (either regular or one-off) corresponding to the amount of money a household needs to cover fully or partially a set of basic and / or recovery needs. The grants are by definition unrestricted cash transfers and thereby grant freedom of choice and priority setting to the beneficiary.¹

One-off unrestricted cash-Grants

Unrestricted cash-Grants, same as Multi-Purpose cash-Grants above, describe an unrestricted cash transfer to the beneficiary, whether in physical cash, prepaid credit card or other. Other than MPG, an unrestricted cash-grants as referred to in this paper, do not cover basic, recurrent needs, but rather aim at covering a specific, one-off need, e.g. winterization costs or transport means.

ATM	Automatic Teller Machine
ACT	Action by Churches Together
CTP	Cash Transfer Programming
DKH	Diakonie Katastrophenhilfe
EURODAC	European Dactyloscopy
IC	Individual Cases
IOCC	International Orthodox Christian Charities
MPG	Multi-Purpose cash-Grant
NFI	Non-Food-Item
NGO	Non-Governmental Organization
NRC	Norwegian Refugee Council
POS	Point of Sale
UN	United Nations
WASH	Water, Sanitation and Hygiene
WU	Western Union

¹ 2015-11 UNHCR et.al.: Draft Document: An Operational Toolkit for Multipurpose Cash Grants

1. [Executive summary](#)

Purpose of this paper

This paper aims at assessing the feasibility and appropriateness of Cash Transfer Programming (CTP) within the operational areas of International Orthodox Christian Charities (IOCC) and their humanitarian response activities to the refugees and migrants' crisis on the Greek islands of Chios and Kos. Awareness about the limitations of traditional in-kind aid, in an unusual humanitarian setting with a highly mobile target group, has led to commissioning this paper; IOCC aims at informing their decision about a potential programmatic shift in their way of delivering humanitarian assistance by making use of CTP.

Methodology: Aspects of feasibility and appropriateness

The below information has been collected in parallel to programme planning activities throughout a period of four weeks spent in Athens, Chios, and Kos. Observations and recommendations result from reviewing existing literature, from conducting key informant interviews, and focus group discussions. The *appropriateness* of CTP will be assessed by the added value it can bring to the response design, by potentially complementing ongoing relief activities in the Country, as well as by the improvement of Value for Money. For CTP to be *feasible*, it has to meet suitable security and functional market environments, it must be socially accepted, be technically possible, and correspond to the legal framework.

About the context

At the time of collecting data, an estimated 719.000 people had entered Greece by sea in 2015, amongst them 25% children, and 16% women ([26.11.15: Refugees / Migrants Emergency Response](#)). Despite rough weather conditions, refugees and migrants arriving in October accounted for 33% of the total arrivals in 2015. The humanitarian crisis at Europe's exterior border occurs in a context, where Greece is facing a significant economic decline, severe austerity measures as well as high levels of political frustrations and determining political events throughout 2015, such as the elections, the referendum, and the insecurity whether or not Greece is going to remain in the Euro zone. IOCC has resumed its activities in Greece since 2012, delivering assistance to vulnerable Greeks in cooperation with its local partner organization "Apostoli". Humanitarian response activities were added to the programme in 2015. This longer-term planning horizon, and the close cooperation with the influential Orthodox Church of Greece, determines IOCCs positioning as a relief actor.

The use of CTP is not new in Greece; e.g. since January 2012, the agency IOCC supported those affected by the financial crisis with a total volume exceeding 17.4 million USD. Programme activities include the provision of fresh-food prepaid cards, and one-off school supply vouchers to large families, alongside in-kind assistance. In the framework of humanitarian relief activities on Chios and Kos, no institutionalized CTP activities had been implemented. However, volunteer networks from across the world have accommodated hundreds of arrivals in hotels by paying the bills in an ad-hoc manner, and international NGOs such as Mercy Corps were in the last preparation phase of piloting unrestricted cash-grants to extremely vulnerable in Kos.

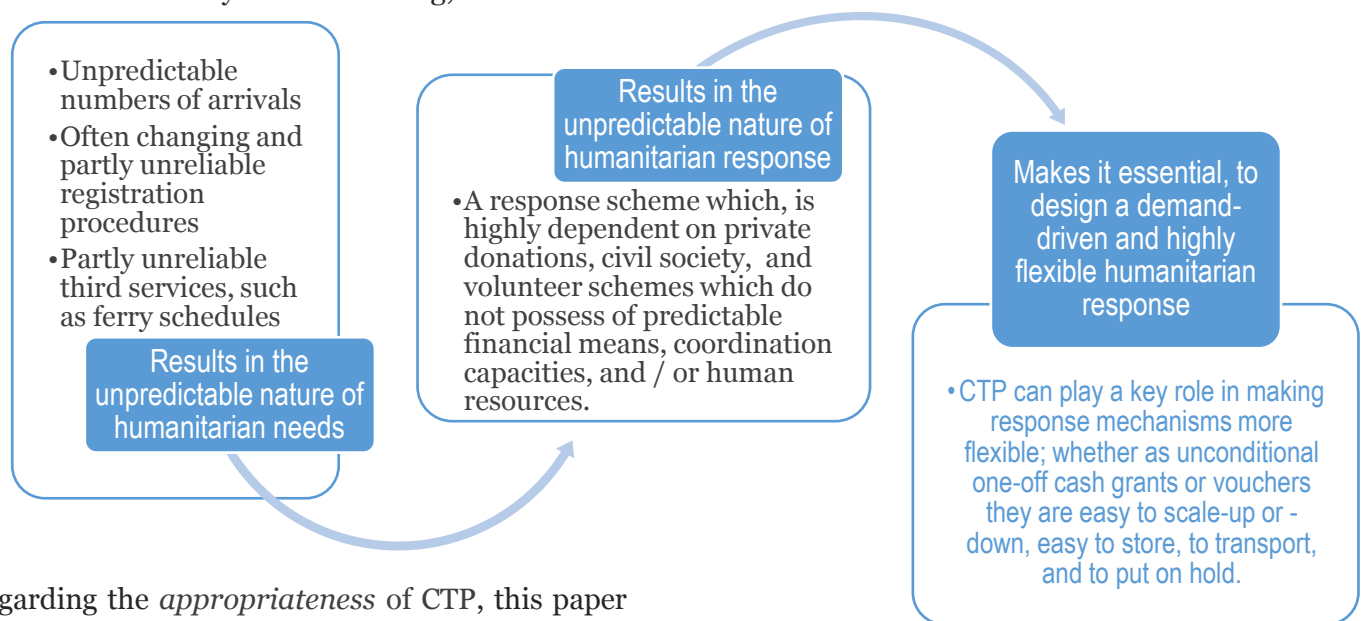
Programmatic objectives

The information outlined in this paper is very specific to the current context on the Greek islands of Chios and Kos. Programme related recommendations, at this stage, aim at informing immediate action and thereby filling the gap during the winter period up until the planned Hot-Spots, longer-term reception facilities, are functional, supposedly by the beginning of 2016. The needs and humanitarian setting are likely to change significantly with the opening of longer-term facilities, mostly in remote areas and with limited access to existing infrastructure. This makes it necessary to reassess CTP planning and implementation once the new infrastructures are functional.

In relation to IOCC's sectors of intervention, as well as priority needs throughout the next months as stated in UNHCRs [Winterization Plan for the Refugee Crisis in Europe](#), this paper mainly assesses CTP opportunities for better responding to food and accommodation needs.

Conclusions about appropriateness and feasibility

Drawing results from discussions with humanitarian stakeholders, existing literature, observation, and participation in coordination meetings, the uniqueness, challenges, and CTP opportunities of the Greek context lay in the following;



Regarding the *appropriateness* of CTP, this paper suggests a significant potential for CTP to improve the quality of a humanitarian response by designing a demand-driven, and flexible in scale response, highly needed in a context where neither humanitarian needs nor response mechanisms seem to be predictable. CTP, whether cash or voucher, better suits the circumstances of the islands of Kos and Chios, where it is unclear how many people will arrive the night, making it difficult to organize assistance on the following day. Furthermore, it seems more effective to hand out cash or vouchers by relying on the existing local infrastructure for actual services, instead of preparing assistance, e.g. food, for x amount of people and then either not have enough or having too many meals. Finally, when considering the recommendations herewith provided, there shall be no risk concerning a potential undermining of ongoing relief efforts.

In terms of *feasibility*, it is concluded that CTP fits the highly developed infrastructure in Greece and does encounter favorable conditions related to the security environment, to cash absorption capacities of local markets, to the legal and administrative framework, and to social acceptance.

Recommendations for response delivery modality

Considering (1) the highly mobile and transitory status of the potential target group, making recurrent assistance in forms of regular top-ups unfeasible at the time being, (2) a setting, where both needs and assistance are unpredictable, as well as (3) the currently severe economic constraints for Greek host populations, this study suggests the use of **paper-vouchers** and **one-off unrestricted cash-grants** as the quickest, and most effective way to meet basic humanitarian needs.

The facilitation of Multi-Purpose cash-Grants² is not being recommended at the time being. This assumption is based on (1) the absence of functioning coordination mechanisms, (2), the fact that no cash-based support schemes are being provided to asylum seekers and recognized refugees in Greece, and finally (3) the above mentioned transitory status of the target group, without an ensured and uninterrupted access to markets.

In the current context, and again referring again to mobility reasons; electronic vouchers, displaying their potential and economy of scale only when being topped-up several times, do not seem recommendable.

² A transfer corresponding to the amount of money a household needs to cover fully or partially a set of basic needs.

The following main recommendations shall inform the integration of CTP into a humanitarian response programme on the Greek islands of Kos and Chios;

- ✓ When integrating CTP assistance into a humanitarian response, alongside relief activities to destitute Greek populations; complement the enlargement of the activities with a communication strategy that proves awareness of the current economic crisis in Greece. [4.1.2].
- ✓ Considering the target group stays on the islands for only a short period of time, repeated top-ups of the same voucher do not seem necessary; consider paper voucher with a short validity date as a quicker solution. Reconsider the use of electronic voucher, and therefore the possibility of recurrent top-ups, and economy of scale, once long term solutions such as Hot-Spots are functioning. [4.2.1].
- ✓ Strongly consider cost-efficiency factors, such as the provision of hot meals through a voucher scheme, even though bulk purchase of dry-meal may appear more cost efficient. [4.2.1].
- ✓ MPGs, as the coverage of basic needs, do not seem recommendable in a situation that lacks information about where people are being located for how long and with what kind of assistance, and about whether or not there is access to markets offering a satisfying variety at appropriate prices. Further challenges concern the fact, that the Greek support scheme to asylum seekers and recognized refugees is non-cash-based; Considerable risks exist to create tension amongst people with different status as well as Greek destitute facing the economic crisis. [4.3.1].
- ✓ Unrestricted one-off cash payments with a sectorial purpose, calculated on the base of priority needs, handed out to extremely vulnerable, unable to cover transport means, can assist migrants and refugees to accessing asylum services and potential personal support networks on the mainland. [4.3.2].
- ✓ Cash-for-Work, or alternatively Ferry-Tickets-for-Work Programmes have the potential to ease arising tensions amongst the host communities and arrivals by benefitting both the target group and local municipalities. [4.3.3].
- ✓ Within the context of assisting a highly mobile target group, and given the unpredictable numbers of needs, voucher schemes present a high potential for delivering a rapid, demand-driven, and flexible in scale response in a transitory environment. [4.3.4].
- ✓ Payment procedures and the financial flow from the humanitarian actor to companies participating in a CTP scheme shall be thoroughly explained to all stakeholders and may start-off with short payment cycles, e.g. weekly or bi-weekly, in order to ease existing concerns regarding the advancement of goods and services. [5.2].
- ✓ The use of unrestricted cash-grants shall be implemented by a humanitarian actor strong enough to accompany project activities with a robust communication rational making the 'case for cash'; both the host population, and beneficiaries shall be provided with the background to calculating the transfer-value, easing the understanding of delivered amounts and the modality's benefits. [5.2].
- ✓ The implementation of new activities, such as the use of CTP in a context where it has not been done so far, shall finally be understood as an important opportunity to reconsider and strengthen the application of standards and harmonization whether with regards to food, to accommodation, to data protection or others. **[Fehler! Verweisquelle konnte nicht gefunden werden.]**

2. [Introduction](#)

This paper looks at whether Cash Transfer Programming (CTP) is feasible and appropriate in the context of a humanitarian response by IOCC / Apostoli to the refugee and migrant crisis in Greece. The **appropriateness** of CTP will be assessed by the added value it can bring to the response design, by its complementarity to ongoing relief activities in the Country, and by the potential improvement of Value for Money. For CTP to be **feasible**, it has to meet a suitable security environment, functional markets, it must be socially accepted, technically possible, and correspond to the legal framework of Greece.

Methodology:

The below information was collated in parallel to other programme planning exercises between 26.10.2015 and 24.11.2015 by the CTP Advisor of DKH, with the support of IOCC Regional Programs Officer for Greece and field staff from the Greek NGO Apostoli in the respective locations. The assessment was started in Athens (26.10.15 – 28.10.2015), from where the team travelled to Chios (29.10.15 – 30.10.15), and to Kos (02.11.15 – 12.11.15). The information provided results from reviewing existing data and literature, from collating primary data by conducting 17 key informant interviews with stakeholders from civil society, local authorities, NGOs, UN, private sector, and business representatives, as well as by holding 3 focus group discussions with in total 32 migrants and refugees, representatives of the potential target group [[Annex 1: Full list of stakeholders contacted](#)]. The decision on where the study would focus on, geographically, was pre-defined by IOCC / Apostoli target area and is therefore limited to the islands of Chios, and Kos.

Institutional set-up of humanitarian stakeholders involved:

For this paper, DKH has facilitated a short-term secondment of its CTP Advisor to support the assessment of feasibility and appropriateness of CTP in the humanitarian context of Greece. IOCC, as the contractual implementing partner of DKH-funded activities, has been participating in data collation and analysis throughout the whole process. Apostoli, as the implementing partner of IOCC, has been kept informed about interim results in an ongoing manner, and has significantly contributed to information acquirement and processing with its staff and knowledge.

Diakonie Katastrophenhilfe is part of the Social Service Agency of the German Protestant Church, one of the biggest welfare institutions in Germany with its headquarter in Berlin. Wherever possible, DKH funds and cooperates with local partner organizations. It is also a member of ACT Alliance (Action by Churches Together), the global alliance of more than 160 protestant and orthodox faith based agencies in the area of humanitarian aid. DKH since September 2015 supports a regional Act Appeal covering Hungary (Hungarian Interchurch Aid), Serbia (Philanthropy Charitable Foundation of the Serbian Orthodox Church), and Greece (IOCC) with financial means, human resources, and coordination tasks to respond to arising needs related to the migrants and refugees crisis.

International Orthodox Christian Charities, also member of Act Alliance, offers emergency relief and development programs to those in need worldwide, without discrimination, and strengthens the capacity of the Orthodox Church to so respond. IOCC had an office in Athens, Greece from 1993 to 2009. In the '90s, with the breakout of war in Yugoslavia, IOCC/Greece served as a logistics hub for IOCC's activities in Serbia, Bosnia, Montenegro, and Croatia. In parallel, IOCC / Greece support relief projects in Ethiopia, Georgia, the West Bank and Gaza, and Iraq. Since 2012, at the invitation of the Greek Church, and in cooperation with Apostoli, the humanitarian arm of the Archdiocese of Athens, IOCC has been responding to the economic crisis in Greece. IOCC / Apostoli have enlarged their assistance to refugees and migrants since 2015, by delivering relief in the sectors of food, NFI, shelter, and WASH.

Apostoli is a local Greek NGO, founded in 2010 by the Archdiocese of Athens and all Greece, operating at a national and international level with an emphasis on developing countries. While the majority of Apostoli's activities are focused the support of sustainable development, social

integration, capacity building and the assistance of socially vulnerable in Greece, it has designed and plans to implement a variety of development, infrastructure and humanitarian projects in the Middle East, Africa, Eastern Europe, Southeast Asia and Latin America. Apostoli operates shelters and day centers in Athens, Greece and nationwide for the socially vulnerable, such as homeless, the mentally-ill, and foremost one of the few shelters for survivors of trafficking and gender-based violence in Greece.

Outlook throughout the winter and timely planning:

Estimates of 719.000 people have entered Greece by sea in 2015, amongst them 25% children, and 16% women. Despite rough weather conditions, the country witnessed refugees and migrants arriving only in October that accounted for 33% of the total arrivals in 2015 ([26.11.15: Refugees / Migrants Emergency Response](#)).

On 26.11.2015, 60% of the arrivals were accounted to be Syrians, followed by Afghanis (24%), Iraqis (8%) and Pakistanis (3%). An increase of Afghan and Pakistani arrivals and families with young children has been observed lately. This is, amongst others, due to the reduced prices for crossing over from Turkey at bad weather conditions; the higher the risk, the lower the price. In its "[Winterization Plan for the Refugee Crisis in Europe November 2015 – February 2016](#)", UNHCR anticipates, between November 2015 and February 2016, that there could be an average of 5,000 arrivals per day from Turkey, resulting in up to a total of 600,000 arrivals in Croatia, Greece, Serbia, Slovenia and the Former Yugoslav Republic of Macedonia. Given the volatile and fast-evolving situation, travel routes may again change in the coming weeks, leading to an increase in the number of affected countries and the points at which winterization assistance will have to be provided. ACAPS, the "Assessment Capacities Project" in its scenarios related to the [European Asylum-Seeker Crisis](#) presents four different outlooks; (1) a continued manageable flow, (2) a significant reduction, (3) a significant increase, and (4) stranded migrants, stuck in transit countries. A continued flow of migrants is estimated to be the most probable development of the crisis (rating 3 of 5). While a decrease seems least likely (rating 1 of 5), both the significant increase as well as the stranding of arrivals in key location have been rated as likely (rating 2 of 5).

With regards to a timely planning; humanitarian action of IOCC at the time of assessing CTP feasibility and appropriateness aims at filling the gap during the winter period up until the planned Hot-Spots are functional, supposedly by the beginning of 2016. Given the ongoing discussions on national level, slow decision processes, and significant resistance to the idea to open Hot-Spots at all especially on touristic islands, a more realistic time frame when planning to hand over services to the Hot-Spots may be March 2016.

2.1. Economic and political impact of the humanitarian crisis

It is important to note, that no independent, thorough assessment about the impact of the migrants and refugees' crisis on Greece economy has been done so far; The Greek islands, although all located relatively close to each other, have varying economic profiles and have therefore been impacted differently by the numerous developments in Greece throughout 2015, e.g. the elections, the referendum, the insecurity whether Greece or not is going to remain in the Euro zone, and finally from the refugees and migrants' crisis. It will be difficult to affiliate economic developments to only one of the above events. However, it is a fact that tourism has clashed with the presence of migrants and refugees throughout the peak season, and there is definitely significant room for polemics, given an additional burden on Greece to deal with a humanitarian crisis, and having to allocate resources to it, in the middle of an economic crisis.

For the whole country, and according to data released by SETE (Association of Greek Tourism Enterprises) in February 2015, it is estimated that the direct contribution of tourism to the Greek economy in 2014 amounted to around 9% of GDP. Taking into consideration the indirect effects of tourism, its total contribution is estimated 18% and 25% of GDP, which renders tourism an important pillar of the Greek economy [[Eurobank June 2015: Global Economic & Market Outlook](#)].

A negative effect of the above circumstances, amongst others the presence of refugees and migrants, has been perceived as more obvious on locations highly dependent on tourism;

Kos:

Tourism is the main income source for Kos Island, the 4th biggest vacation destination in Greece. The island is susceptible to booking cancellations, to losses in indirect income related to tourism, and to damages in reputation. Mrs. Dina Svinou, the President of the Hotels Owner Association on Kos, in an interview on 10.11.2015 states, that the island has seen more than 180.000 cancellations (per person per night) in 2015. This number is calculated based on an average stay of arriving tourist for 7 nights and corresponds to an app. 7 Million Euros, or 4% loss, not considering the indirect damages of restaurants, coffee places, local tour operators, souvenir shops, etc. A decreasing income from tourism needs to be put in a context where economic trends indicated a 20% increase for Kos, according to Mrs. Svinou. Kathimerini Newspaper, 07.11.2015 headline says; “Lesvos and Kos are being erased from the map of tourism”, echoing the estimations of Mr. Stergios Gialliz, President of the Commercial Department of the Chamber of Commerce and Industry of Dodecanese, on 09.11.2015, who foresees a ‘best case scenario’ of 30% losses for businesses indirectly depending from tourism, likely raising to up to 60% - 70%. Overall worries seem to concern the image damages related to negative publicity, associating the name of Kos to mishandling refugee and migrant flows rather than to a vacation destination.

Chios:

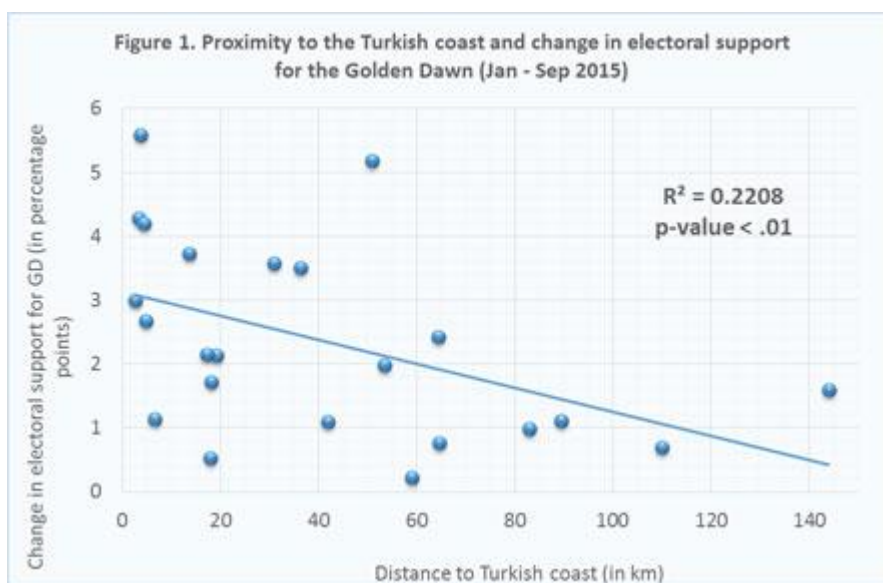
The island of Chios depends much less on Tourism, since its main income source is the production of Mastica, a natural resin used in medical, pharmaceutical, food, and alcohol industry. The Chios Gum Mastic Growers Association is the exclusive manufacturer and distributor of natural Chios mastic, both in Greece and abroad.

In an interview on 30.10.2015, Giorgos Perres, Business Consultant to the Chamber of Commerce of Chios, and Vasilis Papas, its Vice President, both stated, that the majority of local businesses have been affected in a positive way from the migrants and refugees’ presence, especially throughout the winter. This has been confirmed by the local municipality, Giorgos Karamanis, however putting an emphasis on a small number of businesses that, due to their location very close to accommodation sites, have indeed faced significant decreases in income; one of the restaurants situated in the main center of Chios Park, has for instance filed a suit against the municipality for using the park as a temporary accommodation and making him lose customers.

As per the political impact in the whole border region, including Kos and Chios, fears and suspicions seem to clearly influence the respective side-taking;

Kostas Matakos and Dimitros Xeferis in Ekathimerini Newspaper, find a clear, and statistically significant relationship; that is, support for the extremist Golden Dawn Party has increased at a higher rate on islands that are closer to the Turkish coast between January and September 2015 as shown aside [[Near-east effects on far-right success](#)]. The island of Kos was particularly notable

for supporting the far-right party; compared with the previous election on Kos, Golden Dawn nearly doubled its percentage of votes, from 5.87 percent in January to 10.15 percent.



3. Governmental environment

Please note, that at this stage, no further information is provided regarding international or regional legislations such as the Dublin Regulation, the Schengen Agreement, the European Convention on Human Rights, the Common European Asylum System, or the 1951 Geneva Convention.

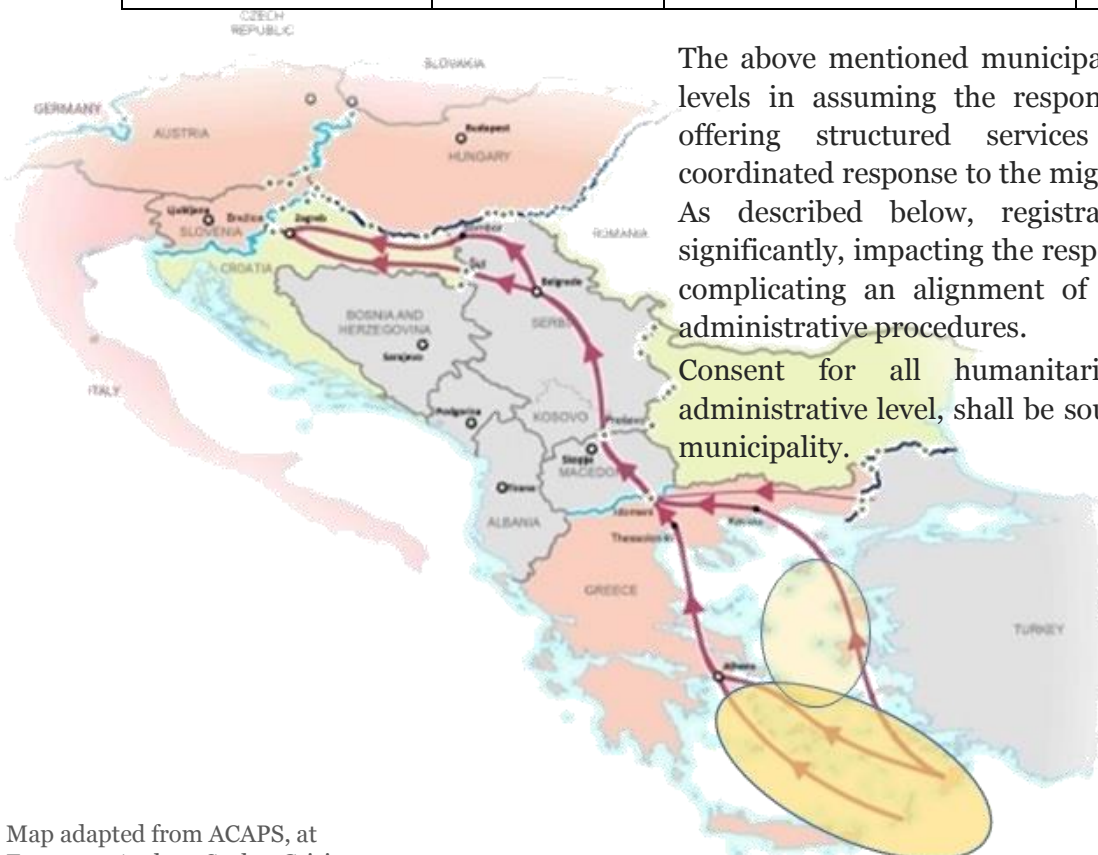
3.1. Administrative set-up

Greece is divided in 13 regions. Those of concern to humanitarian responders, mainly correspond to the entry points and therefore to **Northern and Southern Aegean** [see picture 1 below from ACAPS, the “Assessment Capacities Project” at [European Asylum-Seeker Crisis](#)]. The regions are then further subdivided into regional units and finally into municipalities;

South Aegean is formed of 13 regional units, namely Andros, Kalymnos, Karpathos, Kea-Kythnos, Kos, Milos, Mykonos, Naxos, Paros, Rhodes, Syros, Thira (Santorini), and Tinos. North Aegean consists of the regional units of Chios, Ikaria, Lemnos, Lesvos, and Samos.

Between 01.01.2015 - 05.11.2015, according to the [UNHCR Refugees / Migrants Emergency Response - Mediterranean Site](#), it is the following islands, receiving high numbers of migrants and refugees by sea (Rhodes and Crete have also received minor numbers migrants and refugees);

Arrivals as per 05.11.2015	Municipality	Regional Unit	Region
1.101	Tilos	Rhodes	South Aegean
3.554	Agathonisi	Rhodes	South Aegean
4.692	Symi	Rhodes	South Aegean
7.211	Kalymnos	Kalymnos	South Aegean
31.005	Leros	Kalymnos	South Aegean
50.674	Kos	Kos	South Aegean
78.015	Chios	Chios	North Aegean
81.306	Samos	Samos	North Aegean
356.273	Lesvos	Lesvos	North Aegean



The above mentioned municipalities show very varying levels in assuming the responsibility, in engaging or offering structured services when supporting a coordinated response to the migrants and refugees crisis. As described below, registration procedures differ significantly, impacting the response design, and thereby complicating an alignment of humanitarian actors to administrative procedures.

Consent for all humanitarian activities, on an administrative level, shall be sought for at the respective municipality.

On national level, it is law 3907 / 2011 that shall provide the framework for Greece's asylum system and corresponding services; adopted in 2011, the law adapted Greek legislation to the provisions of Directive 2008/115/EC «with regard to the common rules and procedures in Member States for the return of illegally staying third-country nationals» and other provisions. Law 3907 / 2011 facilitated the establishment of the following:

The asylum service:

Its general objective is to “apply the national legislation and to abide to the country's international obligations regarding the recognition of refugee status and, more generally, granting international protection to aliens who have fled their country due to well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, and who are unable or, owing to such fear, unwilling to avail themselves of the protection of that country” [[Hellenic Republic: Ministry for Citizens Protection](#)].

The First Reception Service:

The objective of the First Reception Service is the reception of third country nationals who are arrested due to illegal entry or stay in Greece, “*under conditions that guarantee human dignity and their rights, in accordance with the international obligations of the country. This reception, in addition to ensuring the immediate vital needs of the third country nationals, includes certain procedures, such as identification, registration, medical screening and socio-psychological support, provision of information on their rights and obligations, and the referral of vulnerable persons such as unaccompanied minors and victims of torture*” [[Hellenic Republic: Ministry for Citizens Protection](#)].

While the official responsibility for managing and taking care of migrants and refugees on the island lies with the Greek government, the reality shows that lack of funds and managerial capacity results in both Civil Society and humanitarian actors providing the majority of these services. The Greek Ministry of interior has announced to open the formerly closed First Reception Centers, because it did not longer have the capacity to provide detained persons with adequate services, amongst them food supply. By granting freedom of movement to migrants and refugees, Greek authorities do not longer assume any responsibility for the duty of care, toward arrivals; In fact, the provision of basic services largely depends on national and international civil society efforts.

3.2. Registration Procedures

On the organizational side, procedures differ significantly from island to island; while authorities in some places have shown successful efforts to speed-up processes, personnel in charge on other islands does not provide services throughout the opening hours. The latter is valid for example for FRONTEX officials in Kos, not respecting the minimum opening hours and hence slowing down registration processes. *In addition, procedures constantly change, making an update on the structures necessary at every response planning stage.*

Chios

People arrive at coast-guard by walking from their stranding point -> first services, e.g. dry cloth and primary health care, are provided by NRC and the Hellenic Red Cross at arrival -> based on the number the coast-guard officer in charge orders transport means to refer arrivals to the registration site at Tabakika location -> arrivals provide information about their name, surname, ethnicity, age or date of birth and family status. Metadrasi and NRC translators help them to full fill the paper in English and refer arrivals to the next step -> checking of their status in first FRONTEX desk (passports and ethnicity) -> arrivals proceed to a desk with official from the National Police and the Coast Guard (24/7) -> the official enter the data into a computer and take fingers print and pictures -> arrivals are referred to a FRONTEX desk (07:00 am till 09:00 pm), having access to the beforehand entered data and runs the EURODAC check -> arrivals receive the registration paper.

Kos

People arrive at the Frontex/Coast Guard booth located at the Port of Kos by walking from their stranding point -> First services, e.g. dry cloth, and primary health care are provided by citizen's groups Kos Solidarity and a Dutch NGO "Dutch Boat Refugees" -> At this first step of registration, arrivals provide information about their name, surname, ethnicity, age or date of birth and family status -> they receive a slip of paper that includes their Frontex Registration number, to be called at the Police Station over the following days, to complete the second phase of their registration -> those who can afford hotels go to their accommodations / those that can't are referred to the Archaeological Park (where MSF and UNHCR have put up tents that can shelter up to 220 persons) -> vulnerable people and families are also identified to be put into hotel rooms paid for by private donors working with citizen's groups -> UNHCR runs information sessions outside Kos Police Station, while fingerprinting is carried out using the EURODAC machines. The officials enter the data into a computer and also take pictures -> once the second phase of registration is completed migrants are free to leave the island and are officially allowed to travel within Greece for a period of 30 days.

4. CTP Appropriateness: Options for improving the current response design

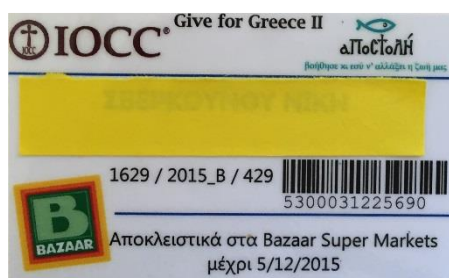
4.1. Integrating humanitarian assistance and relief activities to vulnerable host communities

Amidst an ongoing financial crisis in Greece, where economic growth remains weak,³ unemployment rates stay statically high at app. 25 - 26%⁴ and governmental safety nets fail to perform in 2015, the use of CTP as part of the humanitarian response to the migration flow, needs to be carefully considered; by no means, it must undermine the structural assistance, relief and social protection programming being implemented by IOCC / Apostoli or other actors.

IOCC / Apostoli, since January 2012, have supported those affected by the financial crisis in Greece; the total volume has exceeded 17.4 million USD in both cash and in-kind assistance. Programme activities include the provision of prepaid fresh-food prepaid cards, distribution of family food parcels containing dry food, running of a daily soup kitchen in Athens allowing continued daily service, grants provision to newly established agricultural cooperatives, the distribution of heating fuel to social institutions in northern Greece, the support of medical facilities with supplies, the distribution of one-off school supply vouchers to large families, as well as institutional support to strengthen the response capacity of both faith-based and secular associations.

4.1.1. The use of CTP in IOCC / Apostoli response to the financial crisis

IOCC / Apostoli are in their third year of assisting people affected by the financial crisis with fresh-food **prepaid cards**. The assistance is provided following a call for expressions of interest open to the population of Attica (Athens and surroundings). Applicants self-declare a need in support and are invited to submit respective documents such as income statements for instance. While the applications for 2015 / 2016 are ongoing in October 2015, last years' numbers indicate that approximately 48% of the duly completed applications were identified as eligible; 1.323 families –



almost 5.000 individuals have been receiving fresh-food prepaid cards in 2014 / 2015. IOCC / Apostoli have entered into an agreement with a local supermarket chain with 49 store locations in the target region. Selected beneficiaries are issued with prepaid cards that are credited with 10,00 EUR each week, enabling them to access exclusively local products such as vegetables, fruits, chicken, eggs, and dairy.

The fresh-food prepaid cards accompany food assistance in dry-food family parcels and are designed as a supplement to dietary diversity. The transfer value results from Apostoli's experience on the ground and was in addition determined by budgetary constraints.

CTP is furthermore being applied in the support to vulnerable large families with school-aged children; IOCC / Apostoli provides 40,00 EUR worth, **one-off electronic vouchers**, restricted to the purchase of school material, to 1.120 families at the beginning of the school year. Selected beneficiaries are either organized in two of the 'associations for large families' in Athens or have been identified by benefiting already from the above mentioned food assistance.

4.1.2. Emergency CTP and its compatibility with ongoing assistance programs by IOCC / Apostoli

With regards to **Multi-Purpose cash-Grants**; Apostoli has expressed important concerns: those are related to its long-term engagement in supporting those having suffered from the financial crisis within Greece, worrying about perception issues if cash would be handed out to migrants / refugees in an overall destitute situation of the host community. Considering the role of Apostoli, the use of multi-purpose cash-based assistance, is not recommended, until either / or;

³ [OECD: Greece - Economic forecast summary \(June 2015\) \[28.10.2015\]](#)

⁴ [Eurostats: Unemployment statistics \[28.10.2015\]](#)

- (1) The negative effects of the financial crisis on the host community significantly reduce and make a support from IOCC / Apostoli to destitute Greek unnecessary;
- (2) Greek Social Safety Nets function in a reliable way and continuously support those eligible Greek with sufficient means;
- (3) The IOCC / Apostoli support to those having suffered from the financial crisis can be harmonized in both the modality (multi-purpose cash-based assistance) and the amount given with the support of refugees and migrants travelling through the country; In case, IOCC / Apostoli considers re-designing their support to vulnerable within Greece as per the use of multi-purpose cash-based assistance, an according adaption of the assistance provided to refugees and migrant is an option to consider.

The **use of paper- or electronic vouchers**, replacing in-kind support to refugees and migrants is unlikely to undermined or conflict with ongoing assistance activities by Apostoli / IOCC. The support of small vendors, restaurants, hotels, and shops, by making them participate in a voucher scheme, would rather support the local economy and therefore contribute to the overall goal of IOCC / Apostoli in Greece.

Recommendations:

- ✓ When integrating CTP assistance into a humanitarian response, alongside relief activities to destitute Greek populations; complement the enlargement of the activities with a communication strategy that proves awareness of the current economic crisis in Greece; e.g. collaboration with Chambers of Commerce in informing the public about the potential of CTP benefitting local economies.
- ✓ If engaged in the support to vulnerable host communities facing economic constraints due to the financial crisis in Greece; harmonize assistance values where possible, taking into account contextual factors such as formal or informal support networks available for the different target groups.

4.2. Cost Analysis with regards to IOCC / Apostoli Food Assistance

IOCC / Apostoli, as part of a regional assistance programme funded by Act Alliance were undergoing the purchasing of in-kind food-kits as part of their response to the refugee and migrants' crisis, when carrying out this Cash Feasibility Study in November 2015. The below prices and reference content of delivered food assistance, is therefore predefined by the design and conditions of the Act Alliance response.

4.2.1. Comparing cost-efficiency of in-kind food assistance with CTP scenarios

Information about cost-efficiency, as provided below, is to be read carefully; while the columns one to three can actually be compared, since concerning the same quality and quality of food assistance given out as in-kind food-kits under a parallel project delivering humanitarian assistance, column five and six indicate prices for running a restaurant voucher scheme and would enable beneficiaries to provide themselves with hot meals, important especially throughout the winter period, rather than cold ready-to eat cans and biscuits. The below price information is based on an offer from RedRose, a service provider facilitating electronic cash transfer in a humanitarian context (www.redrosecps.com).

	In-kind Food-Kit Act Appeal	Electronic Voucher Supermarkets	Paper Voucher for Supermarkets	Electronic Voucher Restaurants	Paper Voucher for Restaurants
Content	2 orange juices of 250ml, 2 canned food of beans/green peas, 1 pack of biscuit at 225-285 gr., 4 energy cereals bars, 25-30 gr.	Equivalent to the In-Kind Food-Kit Act Appeal bought in Super Markets ⁵	Equivalent to the In-Kind Food-Kit Act Appeal bought in Super Markets ⁶	Price of one average hot meal including 1 soft-drink in snack-bars ⁷	Price of one average hot meal including 1 soft-drink in snack-bars ⁸
Type	Cold meal	Cold meal	Cold meal	Hot meal	Hot meal
Price per Unit	5,75 EUR	6,54 EUR	6,54 EUR	6,50 EUR	6,50 EUR
Transport and storage	0,13 EUR	0,00 EUR	0,00 EUR	0,00 EUR	0,00 EUR
Packaging material	0,52 EUR	0,00 EUR	0,00 EUR	0,00 EUR	0,00 EUR
Packing Labor-costs	0,06 EUR	0,00 EUR	0,00 EUR	0,00 EUR	0,00 EUR
Running Costs⁹	0,00 EUR	1,43 EUR	0,66 EUR	1,43 EUR	0,66 EUR
Total	6,46 EUR	7,92 €	7,20 €	7,93 EUR	6,66 EUR
Cost of delivering 1,00 EUR of value to the beneficiary	0,12 EUR	0,22 €	0,10 €	0,22 EUR	0,10 EUR
One-Off investment costs	0,00 EUR	8.450 EUR	6.400 EUR	8.450 EUR	6.400 EUR

⁵ Represents the price of purchasing the content of Act Appeal Food-Kits as individual customer on Kos Island (average of three centrally located supermarket prices, namely Proton Supermarket, Carrefour, and AB Vasilopolous).

⁶ Ibid.

⁷ e.g. Two Pita Gyros Chicken or one plate of Pasta Napoli plus 1 soft drink

⁸ Ibid.

⁹ Printing of secured vouchers, service fees for financial tracking system, paper for receipts

As mentioned above; the information provided in the tables requires being put in the current context of the humanitarian response to the migrant and refugees' crisis in Greece;

Running Costs per 1 EUR assistance:

As per the cost of delivering 1,00 Euro of value to the beneficiary, Paper Vouchers seem to be the cheapest solution. In order to enable beneficiaries to purchase the same quality and quantity of food they receive through the in-kind assistance under the Act Appeal programme, IOCC / Apostoli would have to budget 0,10 EUR instead of 0,12 EUR. The same occurs when distributing restaurant vouchers instead of in-kind assistance.

Purchase Value:

Due to better conditions when issuing bulk purchases, the prices for the actual content of the food-kits, or its equivalent being individually procured in local supermarkets, vary significantly; when purchasing the content of the food-kit procured under the Act Appeal, IOCC / Apostoli has to budget 5,75 EUR for 2 orange juices of 250ml, 2 canned food of beans/green peas, 1 pack of biscuit at 225-285 gr., and 4 energy cereals bars, 25-30 gr. The same food can be purchased by an individual for an average price of 6,54 EUR on the islands.

Economy of Scale:

Under the current circumstances, migrants and refugees move quickly towards the mainland, depending on the lengths and speed of registration procedures. Individual-centered monitoring of movement is currently not possible; no data are available regarding who is leaving the island on what day. A break-even point related to the higher individual costs of plastic smart-cards, and thereby economy of scale, only occurs, when the same card can be topped-up various times. This is an option that may be re-considered once the hot-spots are functional, and potential beneficiaries may stay either longer or the needs in assistance become more predictable. At this point, the investment costs and higher running costs due to single-crediting of electronic vouchers and smart cards for food assistance don't seem justifiable.

4.2.2. Cost-effectiveness considerations

There are situations, where the distribution of dry food seems the most suitable solution in the Greek context, such as support first reception of arrivals and migrants at the beach for instance. However, alongside a few efforts to provide migrants and refugees with warm meals, dry-food-kits are still being distributed in significant numbers. This happens during day-time and, depending on the island, in more or less settled facilities – circumstances that would generally allow for providing warm meals. The pertinence of dry foods and ready-to-eat beans with no option for the recipients to actually heat the content seems questionable, especially throughout winter and given the existing technical options and market facilities.

Regarding effectiveness, and therefore the achievement of an intended objective recommended to be the provision of adequate food services in this case, current practices can be improved. *Aiming at providing warm meals, especially throughout the winter period, and granting freedom of choice to the beneficiaries is recommended for future programme design.* The cost of delivering one warm meal including 1 soft drink, by distributing restaurant vouchers and hence granting freedom of choice, according to the below table exceeds the in-kind food assistance by 0,20 EUR.

Recommendations:

- ✓ Strongly consider cost-efficiency factors, such as the provision of hot meals through a voucher scheme, even though bulk purchase of dry-meal may appear more cost efficient.
- ✓ Considering the target group stays on the islands for only a short period of time, repeated top-ups of the same voucher do not seem necessary; consider paper voucher with a short validity date as a quicker solution. Reconsider the use of electronic voucher, and therefore the possibility of recurrent top-ups, and economy of scale, once long term solutions such as Hot-Spots are functioning.

4.3. Considering different CTP components

4.3.1. Multi-Purpose cash-Grants

When assessing options for supporting refugees and migrants with Multi-Purpose cash-Grants, *defined as a transfer corresponding to the amount of money a household needs to cover, fully or partially, its basic needs*, there is a common understanding, that options for aligning or linking support values and mechanisms to existing governmental safety nets shall be assessed. This aims at setting-up short-term humanitarian interventions, which could potentially blend in, or be handed-over to longer term governmental support schemes (exit strategy). In the case of Greece, the existing, very limited, assistance systems to both asylum seekers and recognized refugees do not comprise any cash-based support, and therefore present limited options for aligning MPG;

Support for asylum seekers in Greece:

Asylum seekers, once in the procedure, are being assisted by the ‘National Centre for Social Solidarity (E.K.K.A.)’, a State Organization working under the authority of the Ministry of Labor, Social Insurance and Social Solidarity. The support they are granted is limited to;

- Health Care; asylum seekers have access to medical services in all public hospitals. Medication is, in theory, provided in the same hospitals’ pharmacies, free of charge. However, due to the economic crisis, public pharmacies do often lack basic stocks of medication and refer asylum seekers to international and national NGOs for the provision with medication.
- Education; all children have free-of-charge access to public schools in Greece.
- Shelter; throughout the country, E.K.K.A has at its availability, 968 beds for adults (segregated men, women, family shelter), and 499 places for children to place asylum seekers. A complementary rental support scheme for asylum seekers has stopped functioning in 2011, due to economic constraints.
- Asylum seekers have no access to a work permit, or to marital and family documents.

Support for recognized refugees or beneficiaries of international protection in Greece:

- The right to stay in Greece for three years
- Free Health Care (see details and restrictions above)
- Education (see above)
- Refugees have access to the labor market, by being granted a work permit
- Social security; recognized refugees are entitled to the same (limited) support, that Greek nationals receive from the government
- Travel documents (against a fee)

The European Funding Mechanisms for refugees and migrants (European Refugee Fund or ERF) have changed in in 2013; despite a network of grants available as well as the set-up of a fund following up on the ERF, namely ‘Asylum, Migration and Integration Fund’ (AMIF), bureaucratic requirements currently cause a critical reduction in funding of both governmental and non-governmental bodies supporting the implementation of procedures and assistance structures Furthermore, the austerity measures Greece is currently facing, add on the pressure of respective services; e.g. while Greece asylum services have the staff capacity to handle 10.000 cases of relocation and asylum processes per year, current numbers add up to 33.250 per year (66.500 for two years).

Beyond the potential linkage of humanitarian CTP with existing cash-based support schemes, the use of MPGs is assessed against the quality of coordination, an uninterrupted access to markets and the ability to predict needs throughout a certain period of time. Non of those aspects seems to be grantable, in a situation where the target groups is highly mobile, where location sites for refugees and migrants are sometimes located far from suitable market environments, and where needs may change significantly depending on the services received on the journey, living conditions etc. For example; the individual situation of refugees and migrants can change very quickly, as for

instance seen in Idomeni at the border with 'Former Yugoslav Republic of Macedonia' where from one day to another (at the end of November 2015), it was only specific nationalities that were allowed to pass the border (Syrian, Iraqis, Afghans). All others were remaining in the camps, with no access to appropriate markets.

Recommendations:

- ✓ MPGs, as the coverage of basic needs, do not seem recommendable in a situation that lacks information about where people are being located for how long and with what kind of assistance, and about whether or not there is access to markets offering a satisfying variety at appropriate prices. Further challenges concern the fact, that the Greek support scheme to asylum seekers and recognized refugees is non-cash-based; Considerable risks exist to create tension amongst people with different status as well as Greek destitute facing the economic crisis.

4.3.2. One-off unrestricted Cash-Grants with a sector purpose

The financial flow, as it is normally organized, foresees that the families in home countries provide the arriving persons with funds; for Pakistanis, as understood in focus group discussions, the majority informs their relatives once in the European Union to send money allowing them to arrive at the next stage, e.g. Athens when on the Greek islands. Since most of the refugees / migrants come without identification papers, the direct use of financial service providers such as Western Union is often not an option. Arrivals cope by asking fellow nationals officially residing on the islands to receive the money on their behalf. There is a relatively high probability, depending on the goodwill of the involved people, to charge an extra amount for receiving the money on somebody's behalf; this can be done by purchasing a phone credit to the fund recipients for instance.

For those not having the funds to purchase a ferry boat ticket, and without financial back-up from relatives at home, fellow nationals have pooled pool funds and thereby co-financed tickets for those who would otherwise be stuck. According to both international NGOs, UNHCR and the target group itself, there is only a very little number of people not able to continue their journey due to a lack of financial means. However; the fact of being stranded on one of the islands, without possibility to cover the costs for moving on, is a clear criterion for vulnerability.

Under the condition of accommodation being provided by humanitarian actors, and according to Focus Group Discussions, the main priority for arrivals on the islands, in terms of expenditures, consist of transport means – namely ferry tickets and at a later stage bus tickets once on the mainland. A second priority is food and hot drinks, such as tea and coffee, mainly for avoiding long waiting lines during food distributions, because of the unavailability of free tea and coffee as well as in order to purchase food according to cultural and taste preferences.

Ferry-tickets from the Greek islands to Athens currently cost 54 EUR per person. Bus-Tickets from Athens to the border with 'Former Yugoslav Republic of Macedonia' are at 35 -40 EUR. With an amount of 118,00 EUR, beneficiaries could cover both tickets, plus food and drinks for three days (at 08,00 EUR per day per person).

Recommendations:

- ✓ Unrestricted one-off cash payments, calculated on the base of priority needs, handed out to extremely vulnerable, unable to cover transport means, can assist migrants and refugees to accessing asylum services and potential personal support networks on the mainland.

4.3.3. Cash-for-Work

Waste management systems on all islands receiving migrants and refugees, are unable to properly cope with the additional amount of disposals; distributions happen outside, without being in the position to consider waste management, or reusable plates and cups. In addition to partly lacking sensitivity towards waste disposal, arrivals often remain without fixed accommodation and therefore have to manage personal belongings, and received donations in the open. As a result,

there is a massive presence of waste, especially on Kos beach, including life jackets, sunk plastic boats, blankets, clothes, and usual plastic- and paper leftovers. Waste has been mentioned as an important problem during a meeting with the Vice-mayor of Kos. Also there were incidents, where volunteers supporting the refugees have been aggressed by local communities, claiming not to hand-out any assistance because of the resulting waste problem.

An average salary of a municipality worker in waste management is at 600,00 – 700,00 EUR per month, broke down to a net salary of app. 3,75 EUR per hour. In order for Cash-for-Work programmes in waste management to be effective, it is recommended to base the payment on the amount of collected waste rather than providing hourly remuneration. In terms of a transparent calculation and with the aim of avoiding tensions, a participant in a Cash-for-Work scheme could therefore be redeemed an amount of 3,50 EUR per 20 litre of waste collected, assuming this is the amount that can be gathered in an hour.

Recommendations:

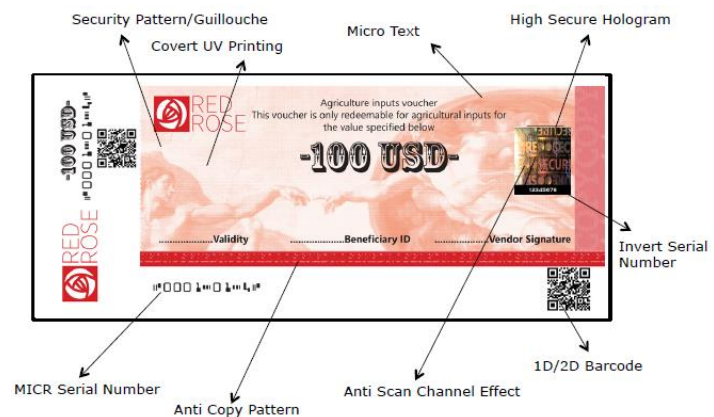
- ✓ Cash-for-Work, or alternatively Ferry-Tickets-for-Work Programmes have the potential to ease arising tensions amongst the host communities and arrivals by benefitting both the target group and local municipalities.

4.3.4. Voucher-Schemes

The business environment on the islands, as well as the rich touristic infrastructure is favorable for the set-up of a voucher system, whether in form of paper or electronic ones. The potential target areas dispose of numerous cheap hotels, local, national, and international supermarket chains as well as coffee shops, snack-bars and restaurants.

Given the highly transitory environment, and therefore no necessity to top-up vouchers several times, the option of paper vouchers was assessed more in-depth for this paper; chapter 4.2 compares different transfer modalities, showing cost advantages for paper vouchers, referring to the RedRose offer, since no economy of scale can be reached with reusable electronic vouchers in a context, where each voucher is only used once. While vouchers should not replace first reception assistance of arrivals with water, biscuits, and NFI, restaurant and hotel voucher seem to be the most appropriate solution for a humanitarian response throughout the winter and up until the Hot-Spots are open, both in terms of speed, meeting standards, and in terms of flexibility in scale. Small snack-bars, cheaper in price than restaurants, can be easily integrated in a paper voucher scheme, offering an agreed minimum of different hot meals for a specific price (5,00 EUR in the above cost scenario) and accepting voucher payments. RedRose vouchers are secured with nine different features (see picture); the Android devices needed for reading the barcode, and thereby facilitating monitoring and financial flow, shall be made at disposal to the participating restaurants.

The significant potential for improving the current humanitarian response in Greece, which lays in the use of vouchers is further described in the annexed project rationales ([Activity outline: Hotel Vouchers granting safe and secure accommodation to arrivals](#) and [Activity outline: Restaurant Vouchers providing arrivals with regular hot meals](#)).



Recommendations:

- ✓ Within the context of assisting a highly mobile target group, and given the unpredictable numbers of needs, voucher schemes present a high potential for delivering a rapid, demand-driven, and flexible in scale response in a transitory environment.

5. CTP Feasibility and operational aspects

5.1. General working conditions: Security and absorption capacity of local markets

Security environment

Greece is a general secure country, with no major threats. The risk for theft and pickpocketing in bigger cities indeed exists, but does not hamper a humanitarian response, including CTP, in any way. Regarding the work with migrants and refugees, Kos island has witnessed some attacks, both verbal and physical against the people of concern as well as against activists and humanitarian aid workers in the beginning of September 2015; “Overnight last night Amnesty staff witnessed a group of 15-25 people brandishing bats physically attack refugees on Kos, while shouting "go back to your countries" and other slurs. They also threatened activists, including an Amnesty International staff member. An activist who was taking photographs had her camera removed and suffered minor injuries. Police did not stop them and riot police only intervened after the physical attacks had started and used teargas to disperse the crowd” [[Amnesty International: Refugees attacked and in 'hellish conditions' on Kos](#)]. Those incidents have not been repeated afterwards. When asking about security concerns during Focus Group Discussions, respondents have denied any kind of fears or doubts related to insecurity; the possessing of financial means in cash does not seem to have resulted in any difficulties so far.

Absorption capacities by local markets

It is important to note, that no full market analysis was undertaken for the islands surveyed. However it is considered that sufficient market information has been gathered by observation and by previous experience to be confident that the existing markets are able to respond to an increased demand;

- (1) Former roving food assistance schemes to migrants and refugees in Chios, implemented by the Greek government up until it was put on hold due to financial constraints, successfully relied on local suppliers; 23 restaurants have been serving up to 900 arrivals per day, two weeks each, without facing problems related to the increased demand. The contract was split by the government amongst the numerous vendors in order to avoid monopolistic market benefits, hence indicating an availability of service providers exceeding the demand.
- (2) The above information on the economic impact on Kos, whose main income source is tourism, indicates that the island, during a normal year, copes with serving or catering a number of visitors exceeding the number of arrivals.
- (3) The existing mini-markets on Kos are adapting to the presence of refugees and migrants, and have hence partly tailored their offer, selling sleeping bags for instance. This can be read as an indicator for an integrated and flexible market.

5.2. Social acceptance and stakeholders' receptiveness towards CTP

As per the current practices on the islands of Chios and Kos, and at the time of writing this report, no CTP project had been implemented yet. However; Mercy Corps was in the final preparation phase to pilot a small-scale unrestricted cash-grant project, distributing prepaid credit cards to extremely vulnerable. No previous experience with vouchers, whether paper or electronic ones, were available.

In general, there seems to be consent, amongst arrivals, that assistance is provided in a sufficient and satisfying manner. Refugees and migrants see the islands as a short term station on their way towards the mainland and / or other countries within the European Union. Being conscious about the short stay under the current conditions, significantly reduces tensions and expectations.

Receptiveness by the target group

When asked responders during Focus Group Discussions, what they spend their money on, leaving beside the travel arrangements which are the main concerns and priorities, the overwhelming majority mentioned food, coffee, and tea in order to avoid long waiting hours. At the same time,

those having private financial means available do regularly access local markets already. No cultural or educational constraints seem to oppose the use of unrestricted cash-grants. With regards to vouchers, the focus was put on potential improvement of current distributions; mainly food. The main problematic with food distributions lies in the long waiting hours. The majority of the Focus Groups responders would therefore prefer a voucher scheme, namely to avoid long queuing but also to choose freely what to eat. Although no food contradicting with religious or cultural behavior is being served by any volunteer association or humanitarian organization on the islands, a doubt seems to remain when receiving ready-to-eat food rations. A fewer number of respondents said a positive aspect of in-kind food assistance is, that one can go several times when willing to queuing again. One responder stated “knowing how we are [referring to fellow nationals], we may do damages when entering restaurants; better for us to wait in a line”.

Receptiveness by business representatives

Having discussed with the Chamber of Commerce of both Chios and Kos, local business representatives are open to the idea of supporting unrestricted cash-grants and voucher schemes, expressing the explicit wish to support local economy. In the case for Kos, the Chamber of Commerce opted for restraining the use of distributed funds to the respective islands, in order to ensure that it is local suppliers that benefit primarily. Stergios Gialliz, President of Commercial Department of the Chamber of Commerce and Industry of Dodecanese, stated that restricting the spending in this sense would be a prerequisite for him to support such idea.

All responders, whether business representatives or bilaterally consulted companies, expressed worries about the trust that businesses have to put in a third actor by advancing services and / or products; in the case of Chios, a formerly functioning catering system involving 23 local restaurants contracted by the Greek government to serve migrants and refugees has faced difficulties, since the participating vendors have not been paid yet. This experience has made vendors cautious, however not unwilling, to participate in a CTP scheme.

Receptiveness by the host community

CTP in Greece, as observed in interviews, discussions with local humanitarian actors and individuals, faces the ‘known’ doubts and reservations, maybe emphasized by the fact that Greece finds itself in the middle of a financial crisis and therefore witnesses fairly recent and multi-present economic decline. While the use of vouchers, instead of in-kind, has not appeared to be questionable amongst those discussed with, there were objections expressed towards unrestricted cash-grants; the majority of them concerning potential misuse of the received funds or anti-social expenditures, as well as the causing or augmenting of tensions between host communities and migrants / refugees.

Recommendations:

- ✓ Payment procedures and the financial flow from the humanitarian actor to companies participating in a CTP scheme shall be thoroughly explained to all stakeholders and may start-off with short payment cycles, e.g. weekly or bi-weekly, in order to ease existing concerns regarding the advancement of goods and services.
- ✓ The use of unrestricted cash-grants shall be implemented by a humanitarian actor strong enough to accompany project activities with a robust communication rational making the ‘case for cash’; both the host population, and beneficiaries shall be provided with the background to calculating the transfer-value, easing the understanding of delivered amounts and the modality’s benefits.

5.3. CTP related payment methods: Legal framework and financial regulations

The below information only assesses operational aspects; even though an option might be feasible, its use is not automatically recommended as appropriate in the Greek context.

5.3.1. Payments to businesses participating in a voucher scheme (bank to bank)

When reimbursing businesses participating in voucher schemes, whether hotels, restaurants, supermarkets or other, no major challenges should arise; restrictions related to Capital Control measures in Greece concern capital flow out of the country, and not those that come into Greece. In that sense;

- Actors can transfer an unlimited amount of money to a business participating in a voucher scheme from an international account (Int. -> Greece).
- Actors can also transfer an unlimited amount of money to a business participating in a voucher scheme from a Greek account to another Greek account; however there might be bank related regulations to follow and bank specific thresholds to be respected (Greece -> Greece).

As a result, there are no operational challenges that would interfere with the set-up a voucher scheme if that is considered appropriate.

5.3.2. Physical Cash

If an actor would want to distribute physical cash, formerly withdrawn from a Greek bank account, the same Capital Control mechanism apply; Drawdowns with debit cards issued are allowed up to 60,00 EUR per day (Monday to Friday) or 420,00 EUR per week. Depending on the number of beneficiaries and the transfer value, this option would require a long preparation period until the funds to be distributed are piled up. International bank accounts, however, are not issue to the Capital Controls and can therefore serve as a source of funds, if the distribution of cash would be part of an assistance programme.

When planning to distribute cash, no feasibility obstacles should occur, when recurring to an international bank account.

5.3.3. Direct transfers to beneficiaries' bank accounts

Under the current law and Capital Controls, new bank accounts can only be opened for specific reasons (such as salary payments e.g.) or in case there is an immediate deposit of 10.000 EUR on the account. Once obtained the permission of opening a bank account, the following information is required, and shall be verified on the basis of original documents issued by reliable and independent sources;

- Full name and father's name
- Identify card or passport umber
- Issuing authority
- Date and place of birth
- Current residence address
- Contact phone number
- Occupation and current occupational address
- Taxpayer's Identification Number
- Specimen of customer's signature

All Greek bank accounts are then issue to the above mentioned Capital Control restrictions.

Given the above regulation as well as the nature of a potential target group, with a majority of refugees and migrants not having identification documents, transitory legal status and no fixed address, the option of supporting the opening of bank accounts is not feasible at the time being.

5.3.4. [Private sector financial service providers](#)

Western Union and MoneyGram are the two private financial service providers operational on both Chios and Kos. There are 4 WU locations in Chios Centre and 3 in Kos town – respectively 4 MoneyGram locations in Chios, and 5 in Kos; all of them in a reasonable distance to the city Centre and therefore the main reference point for migrants and refugees.

For MoneyGram, the transfer limit per client per day is at 14.000 EUR, transferrable in two tranches of 7.000 EUR [as an example; the costs for transferring 7.000 EUR from Germany to Greece are at 150,00 EUR]. Western Union has not generic sealing for transfer amounts per client per day, but requires more detailed information at exceeding an amount of 6.200 EUR, e.g. regarding the professional background.

In order to receive money, beneficiaries need to present the respective transfer reference number as well as a valid identification document with a picture; the registration paper received at presenting themselves at FRONTEX, and Greek authorities upon arrival, is not being accepted by the above service providers. Financial Service Providers are issue to the same Capital Control mechanisms as Greek bank accounts.

In addition to the significant costs for the humanitarian actor, that come with using one of the above financial service providers, it is their identification requirements for receiving a transfer, that poses unsurmountable challenges for potential target group, mostly travelling without any documents. This option is not considered as feasible.

5.3.5. [Pre-paid Cards \(MasterCard\)](#)

ATMs are available on both islands and throughout Greece; MasterCard is the most widely spread credit card system, and according to their [MasterCard Website](#), there are a total of 5.379 ATMs available for use with Master Card throughout the Country. A number of 30 ATMs are indicated for Chios, respectively 75 on Kos.

Depending on where the cards are being charged, the following restrictions come with their use and distribution;

If the cards are issued and charged by a foreign bank:

- The foreign bank has to notify the bank of Greece, that it is issuing this service in Greece.
- The foreign bank has also to clarify, which financial counterpart is going to implement these services in Greece.

If the cards are directly issued and charged by MasterCard:

- MasterCard is already operational in Greece; in that sense, no further steps have to be undertaken.

If the cards are issued and charged by a Greek bank:

- Greek banks are currently not allowed to issue Prepaid Cards, due to Capital Control mechanisms.
- If those are being lifted, Greek banks would be hold to collect information about both, the account holder (NGO) and the ultimate beneficiary, according to the due diligence. In that sense, the same information stated above under [5.3.3](#) (related to opening a bank account) is being asked for.

Kindly note that the below information are based on general stipulations and laws; specific legal advise shall be sought for, when planning actual programme implementation.

As per potential tax related aspects, related to all kinds of donations, it is noted, that based on an Opinion of the Greek Council of State (no 787/97, accepted by the Ministry of Finance by Circular 1188/1998), financial aid provided by a Greek non-profitable legal person pursuing charitable, religious, educational etc. purposes in the context of its scope of activities as included in its founding act does not qualify as donation. The reasoning is that donation presupposes a "voluntary" grant, whereas when non-profitable legal persons grant donations within the

framework of their founding act they are doing so not "voluntary" but in order to fulfil their legal obligation deriving from their founding act.

Therefore, if the NGO could qualify as a non-profitable legal person pursuing charitable, religious, educational etc. purposes based on the laws of the country of its establishment and the pre-paid cards constitute a financial aid provided within the context of its legal obligations as included in its founding act, it could be argued that the act of granting the pre-paid cards does not qualify as donation based on the above reasoning.

Once the details of granting of the pre-paid cards would have been clarified, an ad hoc communication with the competent department of the Ministry of Finance is recommended.

The distribution of Prepaid MasterCard, without passing through an intermediate bank, has been identified as the most feasible option. No operational challenges would hinder humanitarian actors from distributing cash by recurring to prepaid MasterCard.

5.3.6. Cash-for-Work Schemes

According to Greek law, and based on L. 4308/2014, individual entrepreneurs are obliged to be registered with the competent tax authorities and comply with the respective obligations, e.g. maintain accounting books and records etc.

However, such L. 4308/2014 provides also that it is possible for individuals who proceed *occasionally* to the sale of goods or provision of services not to comply with the relevant obligations provided by such law with respect to the maintenance of accounting books and issuance of tax records on the condition that the total amount of the relevant transactions does not exceed 10.000 Euro per year.

The above shall serve for entering further discussions with local authorities, in case Cash-for-Work activities shall be implemented.

5.4. [General notes about targeting and coordination](#)

The short period of time that refugees and migrants remain on Greek islands in average does not allow for an in-depth vulnerability or financial mean screening, beyond applying status based criteria. In this sense, the Shelter Working Group, led by UNHCR, in Kos has circulated the following vulnerability categories, in general applied for prioritizing assistance by all intervening actors;

Prioritization categories & Vulnerability criteria		Facts & conditions to be assessed to finalize the eligibility assessment
Category 1	Families including person with severe disability or severe medical condition.	Ability of disabled individual to sleep in a tent is severely reduced due to the disability. <i>If ICs are unable to afford accommodation.</i>
	Single female.	Not accompanied by an adult male relative. <i>If ICs are unable to afford accommodation.</i>
	Single female head of household with minors.	Not accompanied by an adult male relative. <i>If ICs are unable to afford accommodation.</i>
	Families including pregnant woman.	<i>If ICs are unable to afford accommodation.</i>
	Single elderly person	<i>If ICs not accompanied by family members</i>
	Survivors of serious incidents at the sea	<i>If ICs in difficult psychological and/or physical situation.</i>
	Individuals and families referred by UNHCR, Médecins Sans Frontières, Mercy Corps or others	
Category 2	Families including person with non-severe disability or non-severe medical condition.	<i>If ICs are unable to afford accommodation.</i>
	Families with children under 12 years old, accompanied by a male adult relative.	<i>If ICs are unable to afford accommodation.</i>
	Families with elderly person.	Ability of elderly individual to sleep in a tent is reduced due to his/her physical condition.
Category 3	Families with children over 12 years old, accompanied by a male adult relative.	<i>If ICs are unable to afford accommodation.</i>
	Female accompanied by a male adult relative without children.	<i>If ICs are unable to afford accommodation.</i>

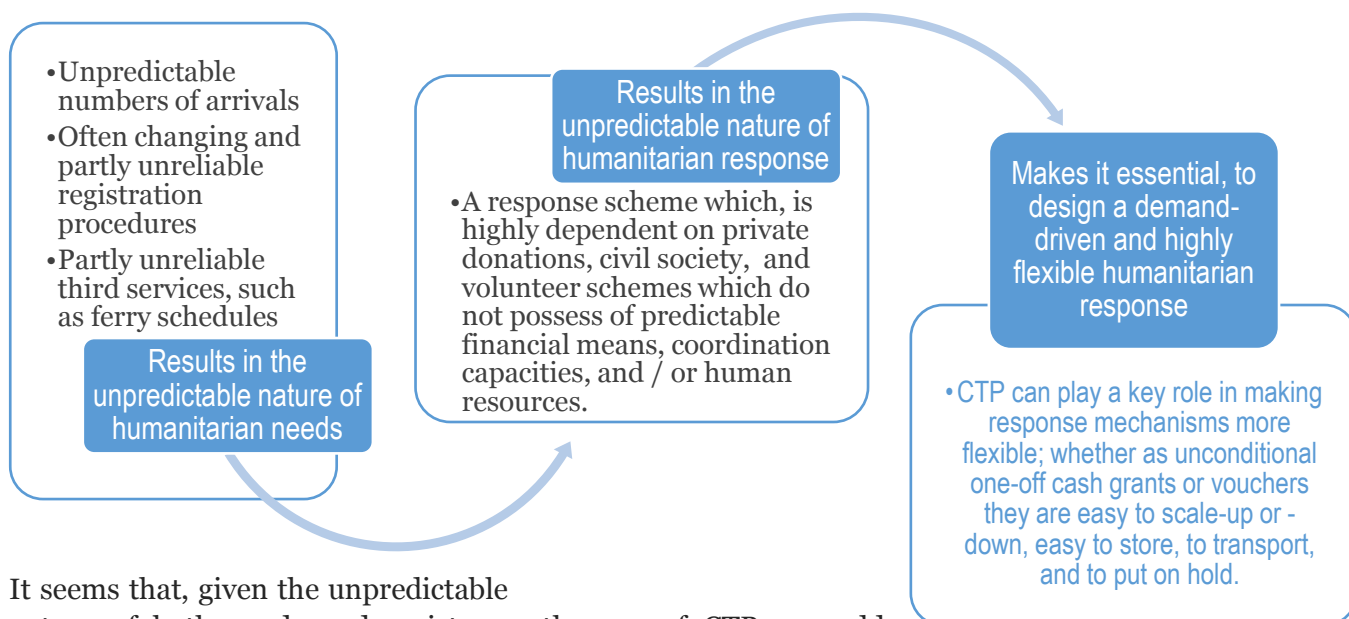
In addition to the above, experience of first reception assistants to arrivals at the beach shows, that the condition of the boats used for crossing, as well as the arrival with weather- and winter-proof clothing and general appearance are factors to consider when assessing eligibility. Finally, those arrivals with own financial means normally leave the registration area straight to a hotel which they pay for on their own. In this sense, the proactive request for support, or the intention of category 1 and 2 vulnerable to stay in the open, shall also judge the conclusion for entitlement.

With regards to coordination; UNHCR is holding weekly meetings, regularly attended by both international and national humanitarian actors, institutionalized volunteer associations as well as individuals involved in providing assistance. On Kos island, there are additional sector-related meetings (such as NFI). So far, efforts seem to focus on updating the 4Ws (Who does What, Where, and When) during the meetings; attempts to organize pipelines, contingency planning, or to tackle harmonization and / or standardization of distributed rations have not come to a conclusion yet. Given the quickly changing humanitarian environment, it is crucial to constantly, and proactively follow-up on the 4Ws, in order to avoid duplication of services.

Note: On Kos islands, NGOs have started to mark the backside of FRONTEX coupons with dates and services delivered, which seems to be a good interim solution to keeping track of assistance, since all arrivals register as soon as they arrive, or as soon as the FRONTEX offices are open, and keep their token until leaving the island.

6. Conclusions

Drawing results from discussions with humanitarian assistance providers, existing literature, observation in the field, and participation in coordination meetings, the uniqueness and challenges of this humanitarian response, as well as the potential for CTP, lay in the following;



It seems that, given the unpredictable nature of both needs and assistance, the use of CTP can add significant value to the quality of a humanitarian response, by being flexible in scale and therefore reducing the risk of having either too much or too little assistance available; e.g. renting an entire premise for arrivals' accommodation risks to be not fully used, when there is less arrivals, or to be insufficient when numbers rise. Making use of the existing (touristic) market infrastructure, especially in the food and accommodation sector, and depending on the context (first reception at arrival versus assistance during the stay on the island) has the potential to significantly increase the quality of a humanitarian response; e.g. providing hot meals through restaurant vouchers instead of cold dry food supply.

Considering (1) the highly mobile and transitory status of the potential target group, making recurrent assistance in forms of regular top-ups unfeasible at the time being, (2) a setting, where both needs and assistance are unpredictable, as well as (3) the currently severe economic constraints for Greek host populations, this study suggests the use of **paper-vouchers** and **one-off unrestricted cash-grants** as the quickest, and most effective way to meet basic humanitarian needs.

The facilitation of Multi-Purpose cash-Grants, as a contribution to the amount of money a household needs to cover fully or partially a set of basic needs, is not being recommended at the time being. This assumption is based on (1) the absence of functioning coordination mechanisms, (2), the fact that no cash-based support schemes are being provided to asylum seekers and recognized refugees in Greece, and finally (3) the above mentioned transitory status of the target group, without an ensured and uninterrupted access to markets.

In the current context, and again referring again to mobility reasons; electronic vouchers, displaying their potential and economy of scale only when being topped-up several times, do not seem recommendable.

Finally, the implementation of new activities, such as the use of CTP in a context where it has not been done so far, shall finally be understood as an opportunity to reconsider and strengthen the application of standards and harmonization whether with regards to food, to accommodation, to data protection or others.

7. Annexes and project rationales

Annex 1: Full list of stakeholders contacted

	Date	Organization	Position	Location
1	27.10.15	UNHCR	Programme Associate	Athens
2	29.10.15	UNHCR	Team Leader Chios	Chios
3	30.10.15	UNHCR	Site Manager	Chios
4	30.10.15	Municipality	Focal Point for Migrant Affairs	Chios
5	30.10.15	Chamber of Commerce	Business Consultant	Chios
	30.10.15	Chamber of Commerce	Vice President	Chios
6	27.10.15	Red Rose	Director	UK
7	02.11.15	UNHCR	Head of Field Office	Kos
8	02.11.15	Mercy Corps	Programme Coordinator	Kos
9	09.11.15	Chamber of Commerce and Industry of Dodecanese	President of Commercial Department	Kos
10	09.11.15	Hoteliers Association of Kos	President	Kos
11	06.11.15	Municipality	Vice-Mayor for Civil Protection	Kos
12	05.11.15	Kos Solidarity	President	Kos
13	13.11.15	Apostoli	Legal Adviser	Athens
14	16.11.15	MacroPolis	Economic Analyst	Athens
15	17.11.15	Alpha Bank	Cards and Consumer Banking	Athens
16	20.11.15	Integration Center for Migrant Workers / Ecumenical Refugee Programme	Head of Office	Athens
17	24.11.15	PricewaterhouseCoopers Business Solutions	Manager Tax & Legal	Athens

7.1. Activity outline: Hotel Vouchers granting safe and secure accommodation to arrivals

Context:

Applicable in geographic areas, where accommodation schemes provided by governmental or humanitarian actors are insufficient, and unable to provide safe and secure accommodation to vulnerable arrivals. The below is valid for a context, where Hot-Spots are not yet up and functioning. An accompaniment of mass accommodation in Hot-Spots, by a voucher scheme targeting extremely vulnerable, could be re-considered once there is more information available on the procedures and practicalities related to those.

Result:

Vulnerable arrivals are granted access to safe, winter-proof accommodation

Target group:

The short period of time that refugees and migrants remain on Greek islands in average does not allow for an in-depth vulnerability or financial mean screening. Targeting could follow the subsequent rationale (categories as determined by UNHCR Kos);

Category 1

- Families including person with severe disability or severe medical condition; Single female; Single female head of household with minors; Families including pregnant woman; Single elderly person; Survivors of serious incidents at the sea; Individuals and families referred by other humanitarian actors

Category 2

- Families including person with non-severe disability or non-severe medical condition; Families with children under 12 years old, accompanied by a male adult relative; Families with elderly person:

Category 3

- Families with children over 12 years old, accompanied by a male adult relative; Female accompanied by a male adult relative without children;

A hotel voucher scheme could target category 1, and 2 vulnerable. Additionally, the condition of the boats used for crossing, as well as the arrival with weather- and winter-proof clothing and general appearance could influence the decision for eligibility. Finally, experience so far has shown, that those arrivals with own financial means normally leave the registration area straight to a hotel they cover on their own. In this sense, the proactive request for support, or the intention of category 1 and 2 vulnerable to stay in the open, shall also judge the decision for eligibility.

Activity:

Set-up a hotel vouchers scheme for those vulnerable groups not being served by other existing support mechanisms;

- (1) NGO staff is going to cover 2 shifts, seven days a week (05:00 pm till 01:00 am and 01:00 am till 09:00 am). While the first shift will be mainly following up on already accommodated beneficiaries, reporting on entries and exists, monitoring the service quality and then starting to be present at the first registration center where arrivals generally assemble, the second shift could focus on receiving new arrivals, alongside with existing volunteer schemes, to provide those eligible with hotel vouchers.
- (2) A voucher scheme could be based on a Memorandum of Understanding between the participating businesses and the NGO. The participating premises shall agree to (1) accommodate hosts presenting a specific voucher and accept a bi-weekly post-payment based on the vouchers presented to the NGO, (2) grant hosts full services at their premises including regular cleaning, towels, use of facilities, Wi-Fi, heating, water, and electricity, (3) provide hosts daily with breakfast, whether prepared at the hotel or by organizing a delivery,(4) ensure that all voucher-holding hosts (above 12 years) are entitled to their own bed, (5) arrange additional beds whether in shared beds or by providing mattresses to children between below 12 years old, (6) notify the NGO about potential closure of your hotel at least one week in advance, (7) accept full responsibility for possible damages to hotel property, and to (8) provide the NGO with full administrative records of the guests accommodated under the voucher scheme including the record of check-in and check-out dates, and (9) agree not to share personal data of hosts with anyone other than those actors entitled by Greek law.
- (3) Arrivals eligible for the hotel vouchers need to be identified based on transparent criteria. This can be done by relying on existing vulnerability screening mechanisms or the NGO, applying the above mentioned criteria. In addition, the scheme can be opened towards referrals from other humanitarian actors.
- (4) Identified beneficiaries could receive hotel vouchers and directions at arrival on the islands. Hosts could be entitled to stay until completion of registration procedures, until leaving the island, considering a sealing as per the number of nights which triggers an individual re-assessment of further eligibility.
- (5) The participating hotels could be re-deemed bi-weekly (see recommendation regarding short payment cycles) based on the vouchers in addition to the hotel's administrative software as well as the beneficiaries signature at check-out stage.

7.2. Activity outline: Restaurant Vouchers providing arrivals with regular hot meals

Context:

The activity outlines is appropriate in a context, where food supply is organized on an ad-hoc base humanitarian actors, provisioning dry cold meals throughout a repeated number of days. Applicable in geographic areas, where migrants and refugees are accommodated in locations with access to a large number of small and medium size restaurants. *The proposed voucher scheme is not meant to replace first reception activities, assisting people with energy biscuits and water upon arrival at the beach or targeted assistance to people with specific dietary needs.*

Result:

Arrivals are provided with at least one regular hot meal per day, throughout their stay on the islands.

Target group:

In a context, where no food assistance is provided by other actors, the below activity does not require targeting but shall be open to all persons passing through the Greek islands on their way to the mainland. Distribution mechanisms, if accompanied by strong information management to the potential target group, could be set-up in a way that people requiring support proactively request for assistance (e.g. regular distribution of food vouchers with 1-day validity in a central location every morning).

Activity:

Set-up a restaurant voucher scheme for migrants and refugees accessible from day one after arriving on the island;

- (1) NGO staff is going to cover 1 shift, seven days a week (06:00 am till 02:00 pm). While the morning hours could be dedicated to distributing vouchers to people presenting themselves at a central, and well communicated location, the second half of the working time could be used for monitoring, administrative, and reporting tasks.
- (2) A voucher scheme could be based on a Memorandum of Understanding between the participating businesses, including small restaurants and snack bars that may need assistance with the provision of technical hardware (e.g. POS terminals), and the NGO. The participating vendors shall agree to (1) accept a bi-weekly post-payment based on the vouchers presented to the NGO, (2) provide a daily minimum choice of warm meals under a certain amount, and considering religious and cultural dietary restrictions, (3) notify the NGO about potential closure of the business at least one week in advance, (4) accept full responsibility for possible damages to restaurant premises, and to (5) provide the NGO with full administrative records of the sold meals.
- (3) All persons presenting themselves at the central distribution point are eligible for receiving food vouchers. A date stamp on one of the papers received during registration processes (e.g. FRONTEX token) can ease monitoring and avoid handing out more than one voucher per person per day. Alternatively, and in order to ease implementation, vouchers can contain the value of two or more day, depending on the individual administrative set-up on the respective islands, and hence the average days of stay.
- (4) The participating vendors could be re-deemed bi-weekly (see recommendation regarding short payment cycles) based on the vouchers in addition to the venue's administrative software.